

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                                |   |                     |
|--------------------------------|---|---------------------|
| WESTFIELD INSURANCE COMPANY,   | ) | C.A. No. 08-56      |
|                                | ) |                     |
| Plaintiff,                     | ) | JURY TRIAL DEMANDED |
|                                | ) |                     |
| v.                             | ) |                     |
|                                | ) |                     |
| CHIP SLAUGHTER AUTO WHOLESALE, | ) |                     |
| INC.; PAUL SLAUGHTER; LEE F.   | ) |                     |
| SLAUGHTER, JR.; DANIEL FEELEY, | ) |                     |
| by his Guardian Ad Litem KELLY | ) |                     |
| BLAIR, LAUREN DIEHL; and COLIN | ) |                     |
| SANDLER,                       | ) |                     |
| Defendants,                    | ) |                     |
|                                | ) |                     |
| v.                             | ) |                     |
|                                | ) |                     |
| CHIP SLAUGHTER AUTO WHOLESALE, | ) |                     |
| INC.; PAUL SLAUGHTER; LEE F.   | ) |                     |
| SLAUGHTER, JR.; DANIEL FEELEY, | ) |                     |
| by his Guardian Ad Litem KELLY | ) |                     |
| BLAIR, LAUREN DIEHL; and COLIN | ) |                     |
| SANDLER,                       | ) |                     |
| Third-Party Plaintiffs,        | ) |                     |
|                                | ) |                     |
| v.                             | ) |                     |
|                                | ) |                     |
| PFISTER INSURANCE INC.         | ) |                     |
| Third-Party Defendant.         | ) |                     |

**NOTICE OF RULE 30(b)(6) DEPOSITION OF THIRD-PARTY DEFENDANT**  
**PFISTER INSURANCE, INC.**

|                               |                                |
|-------------------------------|--------------------------------|
| TO: James S. Yoder, Esquire   | Stephen P. Casarino, Esquire   |
| White and Williams, LLP       | Casarino, Christman & Shalk    |
| 824 N. Market Street, Ste.902 | 800 North King Street, Ste.200 |
| P.O. Box 709                  | P.O. Box 1276                  |
| Wilmington, DE 19899          | Wilmington, DE 19899           |
| Benjamin A. Schwartz          |                                |
| Schwartz & Schwartz           |                                |
| 1140 South State Street       |                                |
| Dover, DE 19901               |                                |

PLEASE TAKE NOTICE that the deposition noticed pursuant to Superior Court Rule 30(b)(6) of the following individual or individuals to be produced by Third-Party Defendant Pfister Insurance, Inc. ("Pfister") will be taken at 11:00 a.m. on Wednesday, October 22, 2008, at the law office of White and Williams, 824 N. Market Street, Suite 902, Wilmington, Delaware 19899.

One or more persons designated pursuant to Rule 30(b)(6)<sup>1</sup> who consents to testify on behalf of Third-Party Defendant Pfister Insurance, Inc., as to all matters known or reasonably available to Pfister Insurance, Inc., regarding the following matters:

(1) Pfister's contentions regarding the facts and matters alleged in the Answer, Counterclaim, Third-Party Complaint, Answer to Counter claim and Answer to Third-Party Complaint;

(2) All information contained in Third-Party Defendant Pfister's claims and coverage files for this accident/claim.

(3) Third-Party Defendant Pfister's contentions regarding any reasons for denying coverage under the claim at issue.

(4) All facts relevant in any way to Third-Party Defendant Pfister's denial of coverage for the claim at issue in this action.

(5) All facts and information related in any way to ownership of the vehicle driven by Paul Slaughter on the day and time of the accident.

(6) All information provided in Third-Party Defendant Pfister's Initial Disclosures;

(7) The factual basis for all defenses and assertions you have pled in this litigation;

(8) The persons and employees of Third-Party Defendant Pfister who have knowledge regarding the items alleged in the pleadings, the extent of their knowledge, and their current employment, addresses, and telephone numbers;

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<sup>1</sup>Third-Party Defendant's Counsel is hereby requested to provide, by October 8, 2008, the names and positions of the representative or representatives which will testify regarding all items known or reasonably available to the Third-Party Defendant's corporation regarding the listed items.

(9) All information regarding any other person, entity, or party that may be potentially responsible for providing insurance coverage on the day and time of the accident.

(10) All information regarding insurance policies which may be applicable to the incident alleged in the Complaint, including but not limited to any policies covering Defendants and Third-Party Plaintiffs Chip Slaughter Auto Wholesale, Inc., Paul Slaughter, Lee F. Slaughter, Jr., Daniel Feeley and Lauren Diehl.

SCHMITTINGER AND RODRIGUEZ, P.A.

BY: 

NICHOLAS H. RODRIGUEZ, ESQUIRE  
Delaware Bar I.D. #356  
414 South State Street  
P.O. Box 497  
Dover, Delaware 19903-0497  
(302) 674-0140  
Attorney for Defendant/  
Third-Party Plaintiff  
Lauren Diehl

DATED: 8/21/08

SCHMITTINGER AND RODRIGUEZ, P.A.

BY: 

JEFFREY J. CLARK, ESQUIRE  
Delaware Bar I.D. #3485  
414 South State Street  
P.O. Box 497  
Dover, Delaware 19903-0497  
(302) 674-0140  
Attorney for Defendant/  
Third-Party Plaintiff  
Daniel Feeley

DATED: 8/21/08

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused copies of the following:

**NOTICE OF RULE 30(b)(6) DEPOSITION OF THIRD-PARTY DEFENDANT**  
**PFISTER INSURANCE, INC.**

to be served upon:

James S. Yoder, Esquire  
White and Williams, LLP  
824 N. Market Street,  
Suite 902  
P.O. Box 709  
Wilmington, DE 19899

Stephen P. Casarino, Esquire  
Casarino, Christman & Shalk  
800 North King Street  
Suite 200  
P.O. Box 1276  
Wilmington, DE 19899

Benjamin A. Schwartz  
Schwartz & Schwartz  
1140 South State Street  
Dover, DE 19901

by e-filing and first-class mail to the addresses listed above on  
8/21, 2008.

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Delaware Bar I.D. #356  
414 South State Street  
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(302) 674-0140  
Attorney for Defendant/  
Third-Party Plaintiff  
Lauren Diehl

DATED: 8/21/08

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Attorney for Defendant/  
Third-Party Plaintiff  
Daniel Feeley

DATED: 8/21/08